



UNITED STATES ANIMAL HEALTH ASSOCIATION

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July 5, 2005

Docket No. 05-015-1
Regulatory Analysis and Development
PPD, APHIS
Station 3C71
4700 River Road Unit 118
Riverdale, MD 20737-1238

Re: Comments on Docket No. 05-015-1

RICHARD D. WILLER
PRESIDENT
ARIZONA DEPARTMENT OF
AGRICULTURE

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PRESIDENT-ELECT
INDIANA STATE BOARD OF
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SECRETARY

J. W. BRYAN
TREASURER
CLEMSON UNIVERSITY

To Whom It May Concern:

On behalf of the United States Animal Health Association (USAHA), I submit the following comments in reference to Docket No. 05-015-1. USAHA is a 109 year-old science-based national organization of state and federal governments, allied industry organizations, universities and other groups that address issues of food safety, animal health and disease control, homeland security, animal welfare and public health. USAHA serves as a clearing house for new information and methods which may be incorporated into laws, regulations, policy and programs. It acts to develop solutions to animal health and food safety issues based on science, new information and methods, public policy, risk/benefit analysis and the ability to develop consensus for changing law, regulations, policies and programs.

USAHA supports the efforts of the United States Department of Agriculture (USDA) to move forward on the implementation of the National Animal Identification System (NAIS). USAHA's Committee on Livestock Identification, along with a number of other USAHA members, including State Veterinarians, have been working on the United States Animal Identification Program (USAIP) for several years. At the 108th Annual Meeting of USAHA in Greensboro, North Carolina, the Committee on Livestock Identification approved the "Draft Program Standards" for the NAIS. This document was included in the Committee Report, approved by the USAHA Board of Directors, and transmitted by the President of USAHA to USDA, Animal and Plant Health Inspection Service, Veterinary Services Deputy Administrator John Clifford. Those draft standards served as the basis for the NAIS Uniform Methods and Rules that are being proposed.

There are a number of issues related to the implementation of the NAIS that remain unresolved, not the least of which is management of individual animal identification and event data, and confidentiality of this information. USAHA Resolution number two from the 108th Annual Meeting urged USDA to cooperatively develop a database system in cooperation with the species, industry segment and issue-based working groups, and state animal health officials. We urge USDA to consider all practical and legitimate alternatives for the NAIS data management system, including any proposed by private industry, before final implementation of the NAIS. While we do not want to delay the implementation of the animal tracking portion of the NAIS, we feel strongly that the issues still being debated, as well as discussion of the eleven key issues specifically identified for comment in the Federal Register notice, should be addressed at the upcoming meeting of the USAHA Committee on Livestock Identification with the goal of reaching consensus on those issues.

Sincerely,

Richard D. Willer
President